

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN
PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;
G.M.; A.S.; and L.T., individuals on behalf of
themselves and all others similarly situated,

Plaintiffs

v.

UNITED STATES OF AMERICA FEDERAL
BUREAU OF PRISONS, a governmental entity;
BUREAU OF PRISONS DIRECTOR
COLETTE PETERS, in her official capacity;
FCI DUBLIN WARDEN THAHESHA JUSINO,
in her official capacity; OFFICER
BELLHOUSE, in his individual capacity;
OFFICER GACAD, in his individual capacity;
OFFICER JONES, in his individual capacity;
LIEUTENANT JONES, in her individual
capacity; OFFICER LEWIS, in his individual
capacity; OFFICER NUNLEY, in his individual
capacity; OFFICER POOL, in his individual
capacity; LIEUTENANT PUTNAM, in his
individual capacity; OFFICER SERRANO, in
his individual capacity; OFFICER SHIRLEY, in
his individual capacity; OFFICER SMITH, in his
individual capacity; and OFFICER VASQUEZ,
in her individual capacity,

Defendants.

CASE NO. 4:23-CV-04155-YGR

DECLARATION OF DENNIS M. WONG


I, Dennis M. Wong, hereby declare as follows:

1. I am the Regional Counsel for the Western Region for the Federal Bureau of Prisons ("BOP"). I have been in this position since 2012 and have worked as an attorney for the BOP since 1994. As Regional Counsel, I oversee BOP legal offices that provide legal counsel to federal prisons in the Western Region, by managing supervisory-level attorneys in the Western Region. My responsibilities include managing resources to support my legal staff, providing legal guidance to BOP staff, and providing litigation support to the U.S. Attorney's Offices as needed. As part of the litigation support process, I obtain and review applicable records and communicate with BOP staff in order to prepare documents that will be used in litigation, such as a declaration.
2. I am familiar with, and have regular access to BOP records and databases, and routinely obtain and review such records as part of my duties as Regional Counsel.

- 1 3. [REDACTED]
- 2 [REDACTED]
- 3 [REDACTED]
- 4 [REDACTED]
- 5 [REDACTED]
- 6 [REDACTED]
- 7 [REDACTED]
- 8 [REDACTED]
- 9 4. [REDACTED]
- 10 [REDACTED]
- 11 [REDACTED]
- 12 [REDACTED]
- 13 [REDACTED]
- 14 [REDACTED]
- 15 [REDACTED]
- 16 [REDACTED]
- 17 [REDACTED]
- 18 [REDACTED]
- 19 [REDACTED]
- 20 [REDACTED]

21 I declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and

22 correct. Executed this 23rd day of February 2024.

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25 DENNIS M. WONG

26 Regional Counsel

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